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regulation is gravite

April 29, 2014

BY FACSIMILE (212-805-0426)

Honorable Laura Taylor Swain United States District Judge Southern District of New York 500 Pearl Street, 8th Floor Mailroom New York, New York 10007 USDC SDNY
DOCUMENT
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Re: United States v. Bonventre, et al., 10 Cr. 228 (LTS)

Dear Judge Swain:

cc:

We represent George Perez in the above matter.

We write to request a modification in Mr. Perez's bail status to permit him to travel with his family to Hershey, Pennsylvania from June 13-15, 2014, for his daughter's soccer tournament. As the Court may recall, Mr. Perez has made similar requests in previous years to travel to Pennsylvania, which the Court has granted. This year, Mr. Perez's request is particularly important in light of his upcoming sentencing date.

The Government has indicated that it does object to this request. Mr. Perez has informed me that Pretrial Services has indicated that it has no objection to this travel request.

We thank the Court in advance for its consideration of this letter.

Respectfully Submitted,

Kimberly A Yuhas, Esq.

Matthew Schwartz, Esq., Randall Jackson, Esq., John Zach, Esq., AUSAs (by Email)

SO ORDERED:

HON. LAURA TAYLOR SWAIN UNITED STATES DISTRICT JUDGE

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